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15 UNITED STATES BANKRUPTCY COURT

16 DISTRICT OF NEVADA

17 In re
18 SPYROS D. KOUNTANIS,
19 Debtor(s).

20 Bankruptcy Case No. BK-S-09-22361-bam

21 Chapter 13

22 FIRST HORIZON HOME LOANS'S
23 REQUEST FOR SPECIAL NOTICE AND
24 SERVICE OF PAPERS AND
25 RESERVATION OF RIGHTS

26 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR/DEBTORS AND ALL
27 INTERESTED PARTIES

28 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for FIRST
1 HORIZON HOME LOANS hereby requests special notice of all events relevant to the above-
2 referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-
3 referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy
4 Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests
5 for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of
6 all matters which must be noticed to creditors, creditors committees and parties-in-interest and other
7 notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the
8 above-referenced bankruptcy court.

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
2 Mailing List in this case, the following address be used:

3 Eddie R. Jimenez
4 PITE DUNCAN, LLP
5 4375 Jutland Drive, Suite 200
6 P.O. Box 17933
7 San Diego, CA 92177-0933

8 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
9 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
10 waiver of the within party's:

11 a. Right to have any and all final orders in any and all non-core matters entered only
12 after de novo review by a United States District Court Judge;

13 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,
14 whether or not the same be designated legal or private rights, or in any case, controversy or
15 proceeding related hereto, notwithstanding the designation or not of such matters as "core
16 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant
17 to statute or the United States Constitution;

18 c. Right to have the reference of this matter withdrawn by the United States District
19 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

20 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
21 which this party is entitled under any agreements at law or in equity or under the United States
22 Constitution.

23 All of the above rights are expressly reserved and preserved by this party without
24 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
25 or by any other participation in these matters.

26 Dated: October 14, 2009

27 /s/ Eddie R. Jimenez
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